



Air Quality Permitting Statement of Basis

July 19, 2007

**Tier II Operating Permit and Permit to Construct
No. T2-2007.0083**

ConAgra Foods Lamb Weston, Inc.

American Falls

Facility ID No. 077-00017

Prepared by:

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Air Quality Division**

PUBLIC COMMENT

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	2
1. PURPOSE	2
2. FACILITY DESCRIPTION.....	2
3. FACILITY / AREA CLASSIFICATION	2
4. APPLICATION SCOPE	2
5. PERMIT ANALYSIS	2
6. PERMIT CONDITIONS.....	2
7. PERMIT REVIEW.....	2
8. RECOMMENDATION	2
APPENDIX A – AIRS INFORMATION	2
APPENDIX B – EMISSIONS INVENTORY	2
APPENDIX C – MODELING REVIEW.....	2

Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CFR	Code of Federal Regulations
CFLWI	ConAgra Foods Lamb Weston, Inc.
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
HAPs	Hazardous Air Pollutants
hp	horsepower
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Available Control Technology
MMBtu/hr	Million British thermal units per hour
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₃	ozone
PM	Particulate Matter
PM ₁₀	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
PTE	Potential to Emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
T/yr	Tons per year
Tier II	Tier II Operating Permit
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Sections 201 and 404.04, Rules for the Control of Air Pollution in Idaho (Rules) for Tier II operating permits and Permits to Construct.

2. FACILITY DESCRIPTION

ConAgra Foods Lamb Weston, Inc.(CFLWI) is a potato processing company. Products include frozen fried potato products and hash browns, and dehydrated potato flakes. The facility operates two frozen fried product lines (1 and 2), a dehydrated flake product line, and two specialized product lines (3 and 5). The frozen fried product lines consist of a dryer and a fryer and each fryer is controlled by a wet scrubber. The dehydrated flake product line consists of two dryers and a pneumatic material handling system with three baghouses. Specialized product line 3 consists of a dryer and a roaster, and Line 5 contains a dryer and two fryers, from which emissions are controlled by two wet scrubbers.

Process steam and hot water are supplied by four boilers. Boilers 1, 2, and 3 are fired on natural gas currently, but are also allowed to combust distillate fuel oil or vegetable oil. These boilers are rated at 98.5 MMBtu/hr, 47.2 MMBtu/hr, and 46.7 MMBtu/hr heat input, respectively. Boiler 4 is fueled exclusively by natural gas and is rated at 2.5 MMBtu/hr heat input.

Natural gas-fired space heaters provide heated make-up air at the facility. Aggregated heat input capacity is 79.7 MMBtu/hr.

3. FACILITY / AREA CLASSIFICATION

CFLWI is defined as a synthetic minor facility because, CFLWI, without permit limits on the potential to emit, the CO and NO_x emissions would each exceed 100 tons per year. Emissions for CO and NO_x are limited to 99 tons per year, which is less than major source thresholds but more than 80 tons per year. Therefore, the AIRS classification is "SM80."

The facility is located within AQCR 61 and UTM zone 12. The facility is located in Power County which is designated and unclassifiable for all criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at CFLWI. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

The application is for a Tier II renewal of Permit No. T2-040324. Additionally, the facility requested to increase Specialized Product Line No. 5 daily production maximum from 130 to 160 T/day and annual emissions from 42,800 to 52,770 tons per 12-month period. Other requests by the facility include minor changes to operating, monitoring, recordkeeping, and reporting requirements. These requests were incorporated into the permit.

The facility also requested to add the following language to Section 6:

"Construction on the ability to burn alternative fuels has ceased. Lamb-Weston would like to continue to have the option to burn alternative fuels in the future if the need arises. If the need to burn alternative fuels arises in the future, Lamb-Weston will complete construction."

This request was not incorporated into the permit. The ability for the facility to burn alternative fuels is still in the permit.

Per IDAPA 58.01.01.211.02, DEQ has the discretion to cancel a permit to construct if construction has not begun within two years of the date of issuance, or if during the construction, work is suspended for one year.

According to the rule, DEQ has the discretion to cancel a PTC if construction has not begun or ceases. This does not mean that DEQ will cancel the PTC. If concerned, the facility may choose to continue minimal construction activities or work with the regional office since “construction” is verified through compliance inspections.

4.1 Application Chronology

May 18, 2007	Renewal permit application was received by DEQ.
June 15, 2007	Application was determined complete.
August 1, 2007	Draft permit sent to Pocatello Regional office for review.

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this Tier II/PTC.

5.1 Equipment Listing

No additional equipment is being permitted in this Tier II/PTC.

5.2 Emissions Inventory

The daily and annual throughput for Specialized Product Line 5 has been increased from 130 to 160 T/day and from 42,800 to 52,770 tons per any 12-month period. As a result, PM₁₀ and VOC emissions increased. The detailed emissions inventory is included in Appendix B.

5.3 Modeling

Emissions increases resulting from the increased throughput requested for Specialized Product Line 5 were discussed with DEQ’s modeling staff. Modeling is not required for VOC emissions per the DEQ Air Quality Modeling Guideline. The increase in PM₁₀ emissions are below the thresholds that trigger modeling. Therefore, DEQ staff determined that modeling was not required for this project.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this Tier II renewal/PTC.

IDAPA 58.01.01.201.....Permit to Construct Required

The proposed project is subject to IDAPA 58.01.01.201 and does not qualify for a PTC exemption; therefore a PTC is required.

IDAPA 58.01.01.401.....Tier II Operating Permit

This permit authorizes the use of a potential to emit limitation to exempt the facility from Tier I permitting requirements.

The procedures for revision or renewal, issuance and approval apply to this permit.

5.5 Fee Review

This is a Tier II renewal, therefore Tier II processing fees apply. In accordance with IDAPA 58.01.01.407.01, for a synthetic minor stationary source with permitted emissions below a major threshold level, the processing fee is \$10,000.00.

The Tier II processing fee is due within 45 days of receipt of an assessment. In accordance with IDAPA 58.01.01.408.02, failure to submit a Tier II operating permit processing fee within forty-five (45) days of receipt of an assessment by the Department will result in a monthly accrual of interest in the amount of twelve percent (12%) per annum on the outstanding balance until the fee is paid in full.

6. PERMIT CONDITIONS

This Tier II/PTC has been updated and/or reformatted. As a result, some numbering differences and changes to facility-wide conditions and general provisions have occurred. Some of the permit conditions have not changed, but have been moved to other sections of the permit. Other permit conditions have been changed or deleted as a result of this permit modification. All other permit conditions remain unchanged. Permit conditions related to the new permit are identified as New Permit Conditions. Permit conditions related to the expired permit no. T2-040324 are identified as Old Permit Conditions. Most of the permit condition changes have already been discussed between the facility and the Pocatello Regional office.

Facility-Wide Conditions Section Changes

A facility-wide condition has been added that requires the permittee to conduct a monthly facility-wide inspection of potential sources of fugitive emissions. This is *New Permit Condition 2.4* in the Facility-Wide Conditions section.

Some of the facility-wide conditions from the expired permit had requirements specific to a particular section. These specific permit conditions (specific throughput limits and boiler conditions) have been moved to appropriate sections in the new permit, but retain the same requirements.

Old Permit Condition 2.11 has been revised. *New Permit Condition 2.18* states: The permittee shall calculate and record monthly the NO_x and CO emissions for the previous consecutive 12-month period to ensure NO_x and CO emissions do not exceed 99 T/yr. The records shall be submitted to DEQ every 12 months by January 31, retained at the facility for the most recent five-year period, and be made available to DEQ representatives upon request.

Old Permit Conditions 2.12 and 2.13 remain the same with the exception that a footnote has been added regarding the emission factors in the chance that they may change in the future. The footnote states: “The permittee shall use the associated emission factors listed in the table or a DEQ approved alternative emission factor.” These are *New Permit Conditions 2.19 and 2.20* in the Facility-Wide Conditions section.

Old Permit Condition 2.16 has been removed from the permit. Test method information will be included in the test protocol which is submitted to DEQ for review prior to the test; therefore, it is not a necessary permit condition.

Emission Unit Sections Changes

Old Permit Condition 2.14 has been changed and moved to Section 7 (Specialized Product Line 3 and Line 5). Throughput has been increased as requested by the facility. *New Permit Condition 7.4* states: Specialized Product Line No. 5 shall not exceed a total maximum output of 160 T/day and 52,770 tons per any consecutive 12-month period.

Old Permit Condition 3.4 has been revised. *New Permit Condition 3.5* states: The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications or the O & M manual, the equipment that continuously measures the pressure differential across the air pollution control equipment and the scrubbing media pressure to the air pollution control equipment.

Old Permit Condition 3.6 has been revised. *New Permit Condition 3.7* states: The pressure drop across the air pollution control devices shall be maintained within manufacturer or O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

Old Permit Condition 3.7 has been revised. The heading for *New Permit Condition 3.8* now reads Scrubbing Media Pump Pressure and states: The scrubbing media pump pressure to the air pollution control devices shall be maintained within manufacturer's or O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

Old Permit Condition 3.9 has been revised. *New Permit Condition 3.11* states: The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control device, once weekly.
- The scrubbing pump pressure to the air pollution device, once weekly.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

New Permit Condition 3.12 has been added. It requires a PM₁₀ performance test for the Frozen Fried Product Line 1 deluge fryer stack. This permit condition was included to demonstrate compliance with the PM₁₀ emissions limits and to ensure emissions calculations are representative for the fryers.

Old Permit Condition 4.4 has been revised to remove "fryer" because the fryer is steam heated. *New Permit Condition 4.5* states: The Frozen Fried Product Line 2, dryer (natural gas-fired), shall burn natural gas exclusively.

Old Permit Condition 4.5 has been revised. *New Permit Condition 4.6* states: The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications or the O & M manual, the equipment that continuously measures the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment.

Old Permit Condition 4.7 has been revised. *New Permit Condition 4.8* states: The pressure drop across the air pollution control devices shall be maintained within manufacturer or O&M manual specifications. Documentation of both the manufacturer's and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

Old Permit Condition 4.8 has been revised. *New Permit Condition 4.9* states: The scrubbing media flow rate to the air pollution control devices shall be maintained within manufacturer's or O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

Old Permit Condition 4.9 has been revised to reflect the fact that only one scrubber exists for Frozen Fried Product Line 2. *New Permit Condition 4.10* states: The associated Ducon scrubber shall be operated at all times when Frozen Fried Product Line 2 is operated.

Old Permit Condition 5.8 has been revised. *New Permit Condition 5.8* states: The pressure drop across the air pollution control devices shall be maintained within manufacturer or O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to DEQ representatives upon request.

Old Permit Condition 4.10 has been revised. *New Permit Condition 4.12* states: The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control device, once weekly.
- The scrubbing media flowrate to the air pollution device, once weekly.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

Old Permit Condition 5.9 has been revised. *New Permit Condition 5.10* states: The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- Pressure drop across the air pollution control devices, once weekly.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

Old Permit Condition 7.8 has been revised. *New Permit Condition 7.9* states: The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of data shall be kept onsite, and shall be made available to DEQ representatives upon request.

- The scrubbing pump pressure to the air pollution device, once weekly.
- Maintenance on the air pollution control device and any modifications made to the operating specifications, as performed.

Summary of Emission Rate Limits Section Changes

Table 8.1 includes actual emission limits for PM₁₀ for the boilers. Both *Old Permit Condition 6.3* and *New Permit Condition 6.3* refer to emissions limits pertaining to the boiler. Since NO_x and CO have facility-wide emissions limits, PM₁₀ limits specific to the boilers were included in Table 8.1.

7. PERMIT REVIEW

7.1 *Regional Review of Draft Permit*

The draft permit was made available for DEQ Pocatello regional office review on August 1, 2007. No changes to the draft permit were suggested.

7.2 *Facility Review of Draft Permit*

The draft permit was sent to the facility for review on August 9, 2007. Comments were received and incorporated into the permit.

7.3 *Public Comment*

A public comment period on the proposed Tier II/PTC will be provided, in accordance with IDAPA 58.01.01.404.01.c.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that ConAgra Foods Lamb Weston, Inc. be issued a draft Tier II/PTC No. T2-2007.0083 for the permit renewal, minor changes to permit conditions and increase in production for Specialized Product Line No. 5. A public comment period was held and the project does not involve PSD requirements.

TAD/slm

Permit No. T2-2007.0083

Appendix A – AIRS Information

T2-2007.0083

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: ConAgra Foods Lamb Weston, Inc.

Facility Location: American Falls

AIRS Number: 077-00017

AIR PROGRAM POLLUTANT	SIP	PS D	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO ₂	B							U
NO _x	SM80					SM80		U
CO	SM80					SM80		U
PM ₁₀	B							U
PT (Particulate)	B							U
VOC	B							U
THAP (Total HAPs)	B							U
APPLICABLE SUBPART								


^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A** = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM** = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B** = Actual and potential emissions below all applicable major source thresholds.
- C** = Class is unknown.
- ND** = Major source thresholds are not defined (e.g., radionuclides).

Appendix B – Emissions Inventory

T2-2007.0083

 DEQ AIR QUALITY PROGRAM 1410 N. Hilton, Boise, ID 83706 For assistance, call the Air Permit Hotline - 1-877-SPERMIT		PERMIT TO CONSTRUCT APPLICATION Revision 3 4/5/2007											
Company Name: Conagra Foods Packaged Food Company Facility Name: American Falls Facility ID No.: 077-00017		Please see instructions on page 2 before filling out the form.											
Brief Project Description: Increase Line 5 Production		SUMMARY OF EMISSIONS INCREASE (PROPOSED PTE - PREVIOUSLY MODELED PTE) - POINT SOURCES											
1.		2.										3.	
Emissions units		Stack ID	PM ₁₀	SO ₂	NO _x	CO	VOC	Lead					
		lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Line 5 Retrograde			0.08										
Line 5 Fryer/scrubber 1			0.13					0.02	0.09				
Line 5 Fryer/scrubber 2			0.13					0.02	0.09				
name of the emissions unit4													
name of the emissions unit5													
name of the emissions unit6													
name of the emissions unit7													
name of the emissions unit8													
name of the emissions unit9													
name of the emissions unit10													
name of the emissions unit11													
name of the emissions unit12													
name of the emissions unit13													
name of the emissions unit14													
name of the emissions unit15													
name of the emissions unit16													
name of the emissions unit17													
name of the emissions unit18													
name of the emissions unit19													
name of the emissions unit20													
name of the emissions unit21													
(insert more rows as needed)													
Total			0.33	1.45	0.00	0.00	0.00	0.00	0.00	0.04	0.17	0.00	0.00

Laird-Weston, American Falls
Proposed Table 8.2 Emission Inventory based on PTE

Changes shown in **BOLD**

	PM10		SO2		CO		VOC		NOx	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Boiler 1	1.65	7.24	5.10	22.36	8.11	35.53	0.53	2.33	9.47	41.48
Boiler 2	0.79	3.47	2.45	10.71	3.89	17.02	0.25	1.11	9.07	39.74
Boiler 3	0.78	3.44	2.42	10.61	3.85	16.85	0.25	1.10	8.99	39.36
Boiler 4	0.02	0.08	0.001	0.006	0.21	0.90	0.01	0.06	0.25	1.07
Line 2 Dryer	1.50	6.56	0.011	0.050	1.61	7.03	0.11	0.46	1.91	8.37
Line 3 Roaster	0.06	0.24	0.004	0.02	0.61	2.67	0.04	0.17	0.73	3.18
Line 3 Retrograde	0.70	3.09								
Line 5 Retrograde	0.46	2.02	0.003	0.01	0.40	1.73	0.03	0.11	0.47	2.06
Line 1 Dryer	2.50	10.97								
Flake Dryer 1 & 2	0.13	0.59								
Line 1 Reyco Scrubber	3.94	17.25					1.22	5.35		
Line 2 Ducon Scrubber	2.13	9.31					0.66	2.89		
Line 5 Fryer/scrubber 1	0.70	3.08	0.003	0.01	0.40	1.73	0.13	0.57	0.47	2.06
Line 5 Fryer/scrubber 2	0.70	3.08	0.003	0.01	0.40	1.73	0.13	0.57	0.47	2.06
Kice filter	0.07	0.32								
Pneumafil filter	0.30	1.29								
Mikro-Pulsair filter	0.15	0.65								
AMUs & space heaters	0.59	2.60	0.047	0.21	6.56	28.74	0.43	1.88	7.81	34.21
Fugitive Dust	3.54	7.91								
Facility Wide Potential		83.19		43.99		99.00		16.60		99.00

Change

1.45

0.17

Lamb-Weston, American Falls
Process PTE (Calculations for Table 8.2)

365 Days per Year 8760 Hours per Year

Current Permitted Line Production

	Estimated Future Production				Estimated Emissions				VOC			
	ton/hr	ton/day	ton/yr	Component Production	PM10		Emissions		Emission Factor		Emissions	
					lb/hr	ton/yr	lb/ton	ton/yr	lb/ton	ton/yr		
Line 1	Dryer & Fryer	39.375	945	344,925	Dryer	39.375	344,925	0.0636	2,504	10.97	1,221	5.35
Line 2	Dryer & Fryer	21.25	510	186,150	Fryer (Reyco)	39.375	344,925	0.1	3,938	17.25	0.031	1.221
					Dryer	21.25	186,150	0.0636	1,352	5.92	0.031	0.659
Flake	2 Dryers	2.11	50.64	18,484	Fryer (Ducon)	21.25	186,150	0.1	2,125	9.31	0.031	2.89
					Drum Dryer 1	1.055	9,242	0.0636	0.067	0.29		
					Drum Dryer 2	1.055	9,242	0.0636	0.067	0.29		
					Kice	2.11	18,484	0.035	0.074	0.32		
Line 3	Dryer (Retrograde) & Roaster	11.08	265.92	97,061	Pneumafil (Collects from 5 areas)	2.11	18,484	0.028	0.295	1.29		
					Mikro-Pulsair (Collects from 2 areas)	2.11	18,484	0.035	0.148	0.65		
					Dryer (Retrograde)	11.08	97,061	0.0636	0.705	3.09		
Line 5	Dryer (Retrograde) & 2 Fryers	5.43	130.32	47,567	Roaster	5.43	47,567	0.0636	0.345	1.51		
					Dryer (Retrograde)	2.715	23,783	0.2	0.543	2.38	0.031	0.084
					Fryer 1	2.715	23,783	0.2	0.543	2.38	0.031	0.084
Total Current Permit					12.71	55.65	2.05	8.97				

365 Days per Year 8760 Hours per Year

Estimated Future Production

	Estimated Future Production				Estimated Emissions				
	ton/hr	ton/day	ton/yr	Component Production	PM10		VOC		
					Emission Factor lb/ton	Emissions ton/yr	Emission Factor lb/ton	Emissions ton/yr	
Line 1 Dryer & Fryer	39.375	945	344,925	Dryer	0.0636	2,504	10.97	1,221	5.35
Line 2 Dryer & Fryer	21.25	510	186,150	Fryer (Reyco)	0.1	3,938	17.25	0.031	1,221
				Dryer	0.0636	1,352	5.92	0.031	659
Flake 2 Dryers	2.11	50.64	18,484	Fryer (Ducon)	0.1	2,125	9.31	0.031	659
				Drum Dryer 1	0.0636	0.067	0.29		
				Drum Dryer 2	0.0636	0.067	0.29		
				Kice	0.035	0.074	0.32		
Kice Baghouse	11.08	265.92	97,061	Pneumafil (Collects from 5 areas)	0.028	0.295	1.29		
				Mikro-Pulsair (Collects from 2 areas)	0.035	0.148	0.65		
Line 3 Dryer (Retrograde) & Roaster	6.68	160,394	58,544	Dryer (Retrograde)	0.0636	0.705	3.09		
Line 5 Dryer (Retrograde) & 2 Fryers	2.715	23.783	23,783	Roaster	All drying emissions are assumed to be from the retrograde.				
				Dryer (Retrograde)	0.2	0.668	2.93	0.031	0.104
				Fryer 1	0.2	0.668	2.93	0.031	0.104
				Fryer 2	0.2	0.668	2.93	0.031	0.104
				Total Permit Change		13.04	57.10	2.09	9.14
				Total Current Permit		12.71	55.65	2.05	8.97
				Change		0.33	1.45	0.04	0.17

Appendix C – Modeling Review

T2-2007.0083

From: Kevin Schilling

Sent: Friday, August 17, 2007 1:46 PM

To: Tracy Drouin

Subject: ConAgra American Falls

Tracy,

The emissions increases associated with the ConAgra PTC/Tier II renewal application are below DEQ established modeling thresholds; therefore, dispersion modeling analyses are not required for the application. Emissions from the ConAgra facility (as evaluated in the previous permit) were included in the AERMOD modeling analyses for the proposed Southeast Idaho Energy, LLC project, and results were well below established standards. Consequently, I feel remodeling for the Tier II renewal is not warranted.

Please contact me if you have any questions or concerns with regard to modeling for this facility.

Kevin Schilling
Stationary Source Air Modeling Coordinator
Idaho Department of Environmental Quality
208 373-0112